To the Honorable, the Judges of said Court;

Samuel W.Hoff objects to the ratification of the sale of the parcel of real estate described i in the Report of Sales of the Trustee filed in this cause on the 23rd day of June, 1924, an the fifth parcel of land mentioned and described in the advertisement of sale, and being the same piece or parcel of land described in No.5" to the Bill of Complaint filed in this cause, and which said piece or parcel of land was purchased by your Orator at a public sale of the same held on the 21st day of June, in the year 1924, because the Trustee cannot give a clear and marketable title to said piece or parcel of real estate for the following reasons;

- 1. Because the whole of said piece or parcel of real estate lies in Carroll County, State of Maryland, and your "onorable Court is without jurisdiction in the premises.
- 2. That even if the sale of said real estate under a decree of your Honorale Court should be held to have been made under Section 87 and 89 of Article 16 of the Code of Public General Laws of Maryland as being a part of the real estate owned by the decedent at the time of his death, no certificate of-the-Bi copies of the Bill, Decree, and TRustee's Report of Sales in this said cause were filed in the Circuit Court for Carroll County, where said land lies.
- 3. That said land was sold under a decree of your Honorable Court based on a Bill for Partition in No.10121 Equity in this Court, and that nothing appears from the Bill or Exhibits in this cause that the proper copies were filed in the Circuit Court for Carroll County, in Equity, in said cause, prior to the sale of said property in said last mentioned cause, although your Objector is informed that said copies were filed in said last mentioned equity cause at some time during the course of said proceedings.
- 4. That it appears from the record that no notice to cretitors was given in this cause either in F"ederick County or Carroll County, Maryland, although the proceedings herein are by Creditors' Bill.
- 5. Because the deed to Aaron R. Anders ,a certified copy of which is maked "Exhibit No. 5" in this cause, is insufficient in law.
- 6. And for other good and sufficient reasons to be made known at the hearing. WHEREFORE your Obejector prays that the sale of the parcel of land reported as aforesaid to Samuel W. Hoff may not be ratified, and that the deposit of One Hundred dollars made by him on the day of sale may be returned to him.

And for such other and further relief as the nature of the case may require.

And as in duty bound, etc.

Arthur D. Willard. Solicitor for Samuel W. Hoff, Objector.

(Filed July 1,1924)

PETITION FOR SUBSTITUTED PURCHASER.

Farmers' & Mechanics National

No.10,913 Equity.

Bank of Frederick,

Vs.

In the Circuit Court

Louise G. Anders and Nancy

for Frederick County.

Anders infant, heirs at law and next of kin of Aaron R. Anders, deceased.

TO THE HONORABLE JUDGES OF SAID COURT; -

The Petition of Dr. U.G. Bourne respectfully shows unto your Honors; -

FIRST; That he is the reported purchaser of the first and second parcels of real estate mentioned in the Report of Sales and that said Report of Sales has not been ratified by this Court.

That your Petitioner purchased said real estate for the The Afro American Building & Improvement Joint Stock Company, Frederick, Maryland, " and your Petitioner now desires to have the said "The Afro American Building & Improvement Joint Stock Company, Frederick, Maryland," substituted as the purchaser of said real estate, at said price of Fifteen Hundred (\$1500.00) Dollars.